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JAN 19 1999

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

January 19, 1999

EX PARTE OR LATE FILED

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
The Portals
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte: CC Docket No. 98-121

Dear Ms. Salas:

On January 19, 1999, I submitted the attached letter and written ex parte to Andrea Kearney of the FCC's Policy Division.

In accordance with the Commission's rules, two copies of this notice are being filed.

Sincerely,

Karen Reidy
Karen Reidy

Attachments

cc: Andrea Kearney
Jake Jennings
Claudia Pabo
Michael Pryor
Claudia Fox

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EX PARTE OR LATE FILED

January 19, 1999

VIA HAND DELIVERY

Ms. Andrea Kearney
Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: Ex Parte: Submission in CC Docket No. 98-121

Dear Andrea:

Per your request, attached are the results, as of January 5, 1999, of the orders MCI WorldCom has been submitting to BellSouth via EDI. These results demonstrate the experiences we discussed with you in our December 23rd meeting.

Please call me if you have any questions.

Sincerely,

Karen Reidy

cc: Michael Pryor
Jake Jennings
Claudia Pabo
Claudia Fox

**MCI WorldCom Production Orders
Results Summary as of January 5, 1999**

A. Background

- ☞ Between November 9, 1998 and January 5, 1999, MCIW transmitted eighteen orders to BellSouth via EDI 7.0. Twelve of those orders were for loop only, four were for loop plus LNP (including one order MCIW resubmitted because Bell South lost the original). Two of the orders were to cancel prior orders.
- ☞ According to BellSouth's own statements, all of the orders MCIW submitted should have flowed through electronically and received electronic responses, except for rejects/clarifications and jeopardies for LNP orders.

B. Results

1. Manual Processing

- ☞ BellSouth handled every order manually at least once, except for the two cancellation orders.
- ☞ MCIW has received twenty rejects. Thirteen have been received manually, six have been received electronically, and one was received both manually and electronically.
- ☞ Sixteen orders have received firm order confirmations ("FOCs"). Except for the two cancellation orders, each of those orders received a FOC manually. In six cases, a duplicate FOC was received electronically after the manual FOC, typically many days later.

2. Completion

- ☞ Twelve orders have been completed. Completion notices have been received for only five of the completed orders (not including a completion notice received for an order that was not completed).
- ☞ Even though MCIW requested due dates substantially later than BellSouth's promised completion intervals, four of the twelve completed orders were not completed by MCIW's requested due date. One of those four orders also was not completed by BellSouth's own promised due date.

3. Processing Errors

- ☞ Twelve of the twenty rejects were for invalid reasons, as BellSouth itself has acknowledged. Two of the valid rejects were the result of MCIW's attempts to respond to invalid rejects.

- ☞ BellSouth lost one order in its system. As a result, MCIW purged that order from MCIW's system. BellSouth subsequently informed MCIW that it had found the order. MCIW then had to cancel the original order and resubmit it.
- ☞ On one order, BellSouth sent a reject after sending a FOC. On the same order, BellSouth sent a completion notice although it had rejected the order and had not in fact completed the order.
- ☞ Four of the five completion notices for orders that actually were completed stated erroneous completion dates.

4. Intervals

- ☞ BellSouth's promised intervals for rejects/clarifications, FOCs, and completion notices are one hour, four hours, and one hour, respectively.
- ☞ The average interval for receipt of a first reject on an order is 4.2 days. The overall average reject interval (including second and subsequent rejects) is 4.4 days. (Even excluding weekends and holidays -- which should be included in an automated environment -- these figures are 2.6 and 2.9 days, respectively).
- ☞ The average interval for receipt of a FOC after submission of a clean order is 7.6 days. In the six cases where BellSouth sent a duplicate electronic FOC after the manual FOC, the duplicate FOC was received an average of 7.8 days after the first FOC. (Excluding weekends and holidays, these figures are 4.9 and 5.8 days, respectively).
- ☞ For the five orders for which completion notices have been received (not including the completion notice received for the order that was not completed), the average interval from completion to receipt of the completion notice is 5.2 days. (Excluding weekends and holidays, this figure is 3.0 days).

C. Two examples

- ☞ MCIW submitted an order on November 9 with a requested due date of November 19. BellSouth sent a valid electronic reject on the same day, which MCIW corrected with a supplemental order on November 10. BellSouth sent an invalid manual reject on November 11. In response to that invalid reject, MCIW sent a supplemental order on November 18. BellSouth sent a valid electronic reject of that supplemental order on November 18. BellSouth sent an invalid manual reject on November 24 in response to the supplemental order from November 10. BellSouth sent a manual FOC on December 1 and completed the order on December 10. BellSouth still has not sent a completion notice for this order.

☞ MCIW submitted an order on November 9 with a requested due date of November 20. BellSouth sent an invalid manual reject on November 13. BellSouth sent two valid manual rejects on November 16. MCIW corrected the rejects with a supplemental order on November 18, which BellSouth acknowledged receiving. On November 24, BellSouth notified MCIW that it had lost the order in its system. MCIW canceled the order on December 3 and received electronic confirmation of the cancellation on December 9. MCIW submitted a new order for the same service on December 9. BellSouth sent an invalid manual reject on December 14. BellSouth sent a manual FOC on December 16 with a promised due date of January 5. MCIW had not received a completion notice as of January 5.